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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,

Plaintiff

vs.

COUNTY OF DAUPHIN,
DAUPHIN COUNTY SHERIFF'S
DEPARTMENT and
RALPH McALLISTER,

Defendants

:
: CIVIL ACTION NO.: 4:CV-01-0967

:
: JUDGE RAMBO ✓

:
: JURY TRIAL DEMANDED

FILED

HARRISBURG, PA

MAR 27 2002

MARY E. D'AMOREA, CLERK
Per

DEFENDANTS, COUNTY OF DAUPHIN AND
DAUPHIN COUNTY SHERIFF'S DEPARTMENT'S
CONCURRED IN MOTION TO REVISE
CASE MANAGEMENT ORDER

AND NOW, come Defendants, County of Dauphin and Dauphin
County Sheriff's Department, by and through their attorneys, Lavery,
Faherty, Young & Patterson, P.C., and file this Concurred in Motion to
Revise Case Management Order and in support thereof, aver as follows:

1. Plaintiff, Cindy L. Rigg, initiated this civil action by filing a Complaint against Defendants, County of Dauphin, Dauphin County Sheriff's Department and Ralph McAllister.
2. Defendants, County of Dauphin and Dauphin County Sheriff's Department, filed a Motion to Dismiss Plaintiff's Complaint. Defendant, Ralph McAllister, also filed a Motion to Dismiss Plaintiff's Complaint, or in the alternative, a Motion for Summary Judgment.
3. By Order dated November 27, 2001, this civil action was reassigned to The Honorable Sylvia J. Rambo.
4. By Order dated December 11, 2001, this Honorable Court afforded Plaintiff an opportunity to engage in preliminary discovery into the employment relationships among Defendants; directed Plaintiff to file an Amended Complaint; and denied Defendants' pending dispositive motions as moot, without prejudice to renew those motions after the filing of Plaintiff's Amended Complaint.
5. On February 11, 2002, Plaintiff filed an Amended Complaint in accordance with this Honorable Court's December 11, 2001 Court Order.
6. On March 6, 2002, Moving Defendants filed a Motion to Dismiss Plaintiff's Amended Complaint. Said dispositive motion will not

be ripe for adjudication until April 26, 2002, which is beyond the current deadline for filing motions for summary judgment.

7. The parties have exchanged written discovery and have completed the deposition of Defendant McAllister. Now that the Amended Complaint has been filed, the parties need to complete the depositions of the Plaintiff and several fact witnesses identified in the written discovery.

8. Based upon the foregoing, Moving Defendants, with the concurrence of all parties, respectfully request that this Honorable Court revise the December 20, 2001 Case Management Order to extend the deadlines for discovery and the filing of dispositive motions for sixty (60) days.

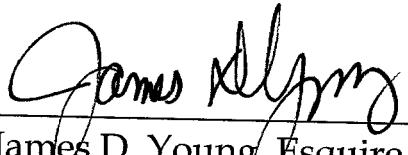
9. The requested extension of time is relatively brief in duration; it will not prejudice any party's substantive rights; it will promote judicial economy; and it will not unduly delay the adjudication of this matter on the merits.

WHEREFORE, Defendants, County of Dauphin and Dauphin County Sheriff's Department, respectfully request that this Honorable Court grant

their Concurred in Motion to Revise Case Management Order and enter the accompanying Order.

Respectfully submitted,

Lavery, Faherty, Young &
Patterson, P.C.

By: 
James D. Young, Esquire
Atty No. 53904
225 Market Street, Suite 304
P.O. Box 1245
Harrisburg, PA 17108-1245
Attys for Defendants,
County of Dauphin and Dauphin
County Sheriff's Department

DATE: 03/28/02

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,

Plaintiff

vs.

COUNTY OF DAUPHIN,
DAUPHIN COUNTY SHERIFF'S
DEPARTMENT and
RALPH McALLISTER,

Defendants

:
: CIVIL ACTION NO.: 4:CV-01-0967

:
: JUDGE RAMBO

:
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CERTIFICATE OF CONCURRENCE

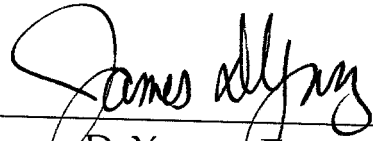
I, James D. Young, Esquire, do hereby certify that I have obtained the concurrence of Spero T. Lappas, Esquire, counsel for Plaintiff, and E. Ralph Godfrey, Esquire, counsel for Defendant McAllister, in the attached Motion to Revise Case Management Order.

Respectfully submitted,

LAVERY, FAHERTY, YOUNG &
PATTERSON, P.C.

Date: 03/28/02

By: _____



James D. Young, Esquire
Attorney I.D. 53904

P. O. Box 1245

Harrisburg, PA 17108-1245

(717) 233-6633

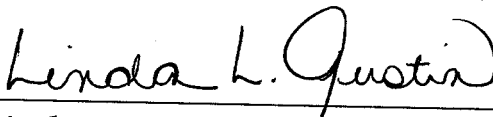
Attorneys for Defendants,
County of Dauphin, and Dauphin
County Sheriff's Department

CERTIFICATE OF SERVICE

I, Linda L. Gustin, an employee with the law firm of Lavery, Faherty, Young & Patterson, P.C., do hereby certify that on this 28th day of March, 2002, I served a true and correct copy of the foregoing **Defendants, County of Dauphin and Dauphin County Sheriff's Department's Concurred In Motion to Revise Case Management Order** via hand delivery, addressed as follows:

Spero T. Lappas, Esquire
Law Offices of Spero T. Lappas
205 State Street
P.O. Box 808
Harrisburg, PA 17108-0808
(Attorney for Plaintiff)

E. Ralph Godfrey, Esquire
Metzger, Wickersham, Knauss & Erb
3211 N. Front Street
P. O. Box 5300
Harrisburg, PA 17110-0300
(Attorney for Defendant McAllister)



Linda L. Gustin